IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	CASE NO. 13-06816-ESL
FERDINAND GARCIA RODRIGUEZ	CHAPTER 13
DEBTOR	

DEBTOR'S MOTION REQUESTING ORDER
RE: AUTHORIZATION TO USE FUNDS FROM LIQUIDATION OF SICK LEAVE 2015

TO THE HONORABLE COURT:

NOW COMES, FERDINAND GARCIA RODRIGUEZ, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor's confirmed Plan dated November 18, 2013, provides that debtor's "tax refunds and employer's liquidation of sick days" will be paid into the Plan. See docket #20.

2. The debtor has received the 2015 employer's liquidation of sick leave for the year 2015, in the sum of $1,585.41. Attached is copy of the check as received from debtor's employer, *Gobierno Municipal de Cidra*, dated March 4, 2016.

3. The debtor respectfully submits to the Court that he needs to use these funds to pay for: car repair expenses. Note that these extraordinary car repair expenses are not considered in debtor's Plan budget. Attached is copy of car repair expenses estimates/invoices.

4. The debtor is living within a very "tight" budget which barely covers his living expenses and a Plan payment of $150.00.

5. Based on the above-stated, the debtor respectfully requests this Court to Order the authorization of the use of these funds to allow the debtor to pay for these expenses with the "2015 sick leave liquidation".

WHEREFORE, debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion and allow the use of the funds from the 2015 sick leave liquidation by the debtor to pay for the above-stated expenses.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to Ferdinand Garcia Rodriguez, PO Box 9964 Cidra PR 00739.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 4th day of April, 2016.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR PETITIONERS
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

Municipio de Cidra
APARTADO 729
CIDRA, PR 00739

Earnings Statement

Municipio de Cidra

Employee Code:	10:7	
Taxable Marital Status:	Single	
Pay Period:	3/1 2016	- 3/15/2016
Pay Date:	3/4/2016	
Voucher Number:	666357	

FERDINAND GARCIA RODRIGUEZ
PO BOX 9964
CIDRA 00739

CO. ID.	CLOCK	B. UNITS
72015001	Not found	19 - 56 - 00 - 00 - 00000000 - 01

Net Pay	=	Earnings	-	Statutory Deductions	-	Other Deductions
$1,585.41		$1 741.36		$155.95		$0.00

EARNINGS

Type	Rate	Hours	Amount	Year to Date
Liquidacion Enf.				
Regular			$1,741.36	$1,741.36
				$929.00
TOTAL			$1,741.36	$2,670.36

PUNCHES

Date	In	Out	In	Out

STATUTORY DEDUCTIONS

Type	Amount	Year to Date
Medicare-EE	$25.25	$79.13
Seguro Social-EE	$107.96	$338.36
Withholding Tax	$22.74	$113.70
Totals Statutory Deductions	$155.95	$531.19

OTHER DEDUCTIONS

Plan Menonita-EE		
Retiro R.2000-EE		$16.50
Seg. Inc. Ret 25		$92.90
TOLIC		$2.32
		$16.23
Totals Other Deductions		$127.95
TOTAL	$155.95	$249.76

OTHER BENEFITS

Total Other Benefits	$0.00	$0.00

LEAVE BALANCE(in hours)

Leave	Remaining

EFT DISTRIBUTIONS

Bank	Account	Amount
BANCO POPULAR	XXXXXX8081	$1,585.41

PAPOTE AUTO AIR

SCANNER
VERIFICACIONES ELECTRÓNICAS
MONTURA Y REPARACIÓN
DE TODO TIPO DE AIRES

SERVICIOS AUTOMOTRIZ
TRABAJAMOS TODO TIPO DE AUTOS:
EUROPEOS, AMERICANOS, HÍBRIDOS Y ASIÁTICOS

Ave. Turabo Gardens • Caguas, P.R. Tels. (787) 533-6971 (787) 961-5090
j&m.autoair@hotmail.com

Fecha 5 marzo 2016 /Estimado

Nombre Ferdinan García Rodríguez

Marca de Carro Isuzu Tablilla

Descripción	Precio
Montura de Compresor	$650.00
Montura de Valvula	
Montura de Botella	
Carga de GAS	
Afloches de sistema	
Orines, gusanos	
Aceite	
Vacio	
LABOR	
Garantia de por vida	
$ Total	650.00

Work Order

Pep Boys

CAUGUAS
PEP BOYS #912
AVE RAFAEL CORDERO
CAGUAS,PR 00725
(787) 286-2700

GERENTE: LUIS MEDINA

TRACKING ID# *	
Store ID #	Service Work Order #
0912	2243961

Cliente:	**Año:** 1999	**Fecha:**	2016-03-05
Dirección:	**Marca:** ISUZU TRUCK	**Anotado Por:**	NA
Ciudad:	**Modelo:** TROOPER	**Hora De Ingreso:**	17:16:01
Estado:	**Motor:** V6-3494 3.5L DOHC	**Fecha/Hora prometida:**	
Código postal:	**Numero De VIN:**	**El carro listo partes Viejas requeridas por el cliente?**	no
Teléfono Casero:	**Número De la Licencia:**		
Teléfono Del Contacto:	**Millaje Entrada / Salida:** /		
	Color:		

CARGOS DE ALMACENAJE: Cualquier vehículos que se dejen desatendido durante más de 7 días, pueden ser remolcados a costos del propietario. Para más información, favor consultar con gerente de tienda.

AUTORIZO A PEP BOYS A LLEVAR A CABO LAS REPARACIONES DESCRITAS EN ESTA PAGINA Y PROVEER LOS MATERIALES QEU SEAN NECESARIOS. ENTIENDO QUE CUALQUIER PRECIO COTIZADO ES UN ESTIMADO.LOS EMPLEADOS DE PEP BOYS PODRAN MANEJAR ESTE VEHICULO PARA FINES DE INSPECCION, PRUEBAS Y ENTREGA Y PODRAN ESTACIONAR EL VEHICULO EN EL ESTACIONAMIENTO EXTERIOR. PEP BOYS NO SE HACE RESPONSIBLE POR PERDIDA O DANOS AL VEHICULO O ARTICULOS DEJADOS DENTRO DEL VEHICULO EN CASO DE FUEGO, ROBO O POR CUALQUIEROTRA RAZON NO CAUSADA POR PEP BOYS. VEHICLES QUE PERMANEZCAN HASTA EL OTRO DIA SERAN A RIESGO DEL DUENO,ENTIENDO QUE PEP BOYS NO ESTA ASUMIENDO RESPONSABILIDAD ALGUNA POR DANO O ROBO DEL VEHICULO EN CUALQUIER MOMENTO EN QUE EL VEHICULO NO ESTE DENTRO DEL EDIFICIO DE PEP BOYS O SIENDO CONDUCIDO POR PEP BOYS. RECONOZCO UN GRAVAMEN SOBRE EL VEHICULO PARA ASEGURAR EL PAGO POR TRABAJO LLEVADO A CABO BAJO EL ESTIMADO DE REPARACIONES ESCRITO.

x

Estimado Inicial	Cargos Por Piezas	Cargos De Trabajo	Cargos Totales	Fecha Y Hora :	Tarifa De Trabajo
	753.66	99.94	957.32	2016-03-05 17:16:01	80.00/80.00

CUSTOMER NOTIFIED OF AND APPROVED INCREASE(S) IN THE ORIGINAL ESTIMATED PRICE
( ) IN PERSON ( ) PHONE
SIGNED DATE

TYPE	PART	DESCRIPTION	CODE	MECHANIC	HRLY RATE	HRS	QTY	SOURCE	EACH	TOTAL
OT		Shop Fee *** SKU 4120 represents costs and profits to the motor vehicle repair facility for miscellaneous shop supplies ***	N				1		4.99	4.99

Not Yet Authorized

TYPE	PART	DESCRIPTION	CODE	MECHANIC	HRLY RATE	HRS	QTY	SOURCE	EACH	TOTAL
PK	9084807	**TIRE INSTALLATION PACKAGE**								
LB		TIRE MOUNTING	N				5		0.00	0.00
LB		WHEEL BALANCE PASSENGER 16-19 & TRUCK	N				5		9.99	49.95
PN	4000	ROAD HAZARD WARRANTY	N				5		17.55	87.75
PN	TV413	30413500PEP 1 1/4 RUBBER VALVE STEM	N				4		3.99	15.96
									Package SubTotal :	**153.66**
PN	00000004790	Futura Scrambler P24570R16 40,000 MILE PRORATED	N				5		129.99	649.95
LB		COMPUTERIZED WHEEL ALIGNMENT	N				1		49.99	49.99

Parts : 753.66 Labor : 99.94 Other : 4.99 IVU Tax : 90.15 Lcl Tax : 8.58 Total : 957.32

Code Descriptions

N:Nuevo

* Ahora puede seguir el estatus de su Vehículo. Sólo visite www.pepboys.com y entre su numero de Tracking ID (0912 - 2243961), en el E-Service Center.
Store ID - Service Work Order

800-PEP-BOYS

Cuando necesite un remolque? Llame Gratis a:
800-PEP-BOYS (1-800-737-2697)